



Stanford University

INFORMATION TECHNOLOGY SYSTEMS AND SERVICES
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October 22, 2001

Re: CC Docket No. 91-281, NSD File No. NSD-L-01-153: INSIGHT 100
Requests a Waiver of 47 C.F.R. § 64.1601(b) Regarding the Transmission
of CPN

To the Common Carrier Bureau:

On October 5, 2001, the Commission issued a Public Notice (DA 01-2322) seeking comment on INSIGHT 100, Inc.'s Petition for Waiver of Section 64.1601(b) of the Commission's Rules. If granted, the Petition would allow authorized personnel at a limited number of hospitals and universities to access the calling party number ("CPN") of callers that are either seeking emergency services or engaging in threatening behavior, but are calling from a telephone whose privacy indicator is activated. As a university that is responsible for the safety and security of its students, staff, and two hospitals, Stanford University believes that it is in the public interest to grant the relief sought by INSIGHT 100 because such selective access to CPN will allow Stanford's emergency service providers to respond more quickly and more appropriately to a wide variety of emergency situations.

Stanford further believes that the criticisms set forth by Metrocare in its comments on the INSIGHT 100 Petition are without merit. In particular, Metrocare argues that: (1) it is possible for hospitals and universities to segregate incoming lines into "emergency" and "non-emergency" lines; and (2) the INSIGHT 100 proposal would compromise the privacy of those calling hospitals and universities by providing the called party with access to the CPN of a caller that had activated his or her privacy indicator.

First, hospital and universities rarely have dedicated lines that terminate at the office of a single campus emergency service provider. Rather, these emergency services are usually geographically dispersed and are provided across a wide spectrum of the organization. Further, many of these services are dispatched through call centers that take in a high volume of calls from the public and provide incoming callers with directory information for the entire university or hospital. Thus, a caller in need of assistance or engaging in threatening behavior is quite likely to call the hospital's or university's general number, and it is the personnel that answer these calls who must have the ability to order customer originated traces on these callers who are in need of assistance or are engaging in threatening behavior.

Second, under the provisions of the requested waiver, the central office class machines operated by entities eligible for the waiver would *not* deliver *private* CPN to *any* called party's phone. As noted in the Petition, only entities whose central office class equipment is capable of receiving and properly interpreting the privacy indicator are eligible for the waiver. Therefore, the campus resident who originates a trace will not have access to the calling party's private CPN. Rather, all private CPN information would be written to a call trace log, held in secure areas, and made available only to authorized emergency response personnel.

Because the relief requested by INSIGHT 100 will greatly assist in ensuring the safety and security of those residing in and working at America's hospitals and universities, and the criticisms of the INSIGHT 100 proposal are not well founded, Stanford University strongly urges the Commission to grant the instant Petition as soon as possible.

Respectfully submitted,

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